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March 14, 2013

The Honorable Carl Levin
Chairman
The Honorable James N. Inhofe
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Howard P. McKeon
Chairman
The Honorable Adam Smith
Ranking Member
Committee on Armed Services
House of Representatives

Subject: *Defense Health Care: DOD Chiropractor Wage Rates*

In response to congressional direction in House Report 112-479,¹ the enclosed briefing provides information on the wage rates of the Department of Defense's (DOD) federal civilian chiropractors compared with the wages of other federal civilian health care professionals within DOD with similar training and education. We provided this briefing to the staff from the Senate and House Committees on Armed Services on February 4, 2013 and January 29, 2013, respectively. We found that DOD employs 90 chiropractors at 62 military treatment facilities as of January 2013. Further, the mean salary of DOD's federal civilian chiropractors is similar to the mean salary of those serving in comparable DOD federal civilian health care occupations. Specifically, we found that the mean salaries of our selected health care professions ranged from approximately \$77,000 to approximately \$94,000 with the mean salary for chiropractors approximately 7 percent higher than the lowest mean salary and approximately 12 percent lower than the highest mean salary. Although these health care positions have similar education and training requirements, they have some different responsibilities.

To identify the number and location of DOD chiropractors that provide care for active duty servicemembers, we interviewed DOD officials and requested and analyzed information about the number and location of DOD chiropractors. To determine wage rates for DOD federal civilian chiropractors and selected DOD federal civilian health care professionals, we analyzed salary and GS grade level data. We selected

¹ H.R. Rep. No. 112-479, at page 178 (2012).

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health care positions within DOD that have requirements and health care responsibilities that are comparable to chiropractors. Finally, we assessed the reliability of the data source and found it sufficiently reliable for our purposes.

We conducted this performance audit from August 2012 to March 2013 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings based on our audit objectives.

In response to a draft of the enclosed briefing slides, DOD provided technical comments that have been incorporated as appropriate. We are sending a copy of this report to the appropriate congressional committees, Secretary of Defense, the Under Secretary of Defense for Personnel and Readiness, and the Assistant Secretary of Defense for Health Affairs. In addition, this report will be available at no charge on the GAO Web site at <http://www.gao.gov>.

Should you or your staff have any questions concerning this report, please contact me at (202) 512-3604 or farrellb@gao.gov. Contact points for our Office of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made contributions to this report are listed on the last page of the enclosed briefing.

A handwritten signature in black ink that reads "Brenda S. Farrell". The signature is fluid and cursive, with "Brenda" on top and "S. Farrell" below it.

Brenda S. Farrell
Director
Defense Capabilities and Management

Enclosure

DOD Chiropractor Wage Rates

Briefing to Congressional Staff
Senate Armed Services Committee • February 4, 2013
House Armed Services Committee • January 29, 2013

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Introduction

- In 2000, Congress mandated that the Department of Defense (DOD) develop a plan to provide chiropractic care as a permanent part of the Defense Health Program.
 - Prior to the establishment of DOD's chiropractic program, Congress directed DOD to conduct demonstration projects to evaluate the feasibility and advisability of expanding DOD's health system to include chiropractic care.
 - The National Defense Authorization Act for Fiscal Year 1995 directed the Secretary of Defense to establish a chiropractic demonstration project at a minimum of 10 military treatment facilities for 3 years.
 - Following the demonstration project, DOD reported that providing chiropractic care was feasible, but not fiscally practical.
- In 2012, Congress directed GAO to conduct a study on the wage rates of DOD chiropractors compared with the wages of health care professionals with similar training; skill sets; licensure requirements; certification requirements; and health care responsibilities.¹

¹See page 178 of H.R. Rep. No. 112-479, the conference report accompanying the National Defense Authorization Act for Fiscal Year 2013.

Background

- Chiropractic is a health care discipline concerned with disorders of the musculoskeletal system—consisting of muscles, tendons, ligaments, and bones—and the effects of these disorders on the function of the nervous system and general health. Chiropractic emphasizes manual treatments, including spinal adjustment and other joint and soft-tissue manipulation.
- According to DOD officials, in 2009, DOD gave the services the option to convert their chiropractor positions from contractor to civilian status; therefore, the civilian chiropractor position is new to DOD.

Background

Table 1: Timeline of DOD's Chiropractic Program

Year	Event
1984	The DOD Authorization Act of 1985 directed DOD to conduct a demonstration project to evaluate the cost effectiveness of providing chiropractic services for active duty service members, retirees, and their dependents.
1993	DOD prepared a report to Congress on the Civilian Health and Medical Program of the Uniformed Services (CHAMPUS) Chiropractic Demonstration Project. The report stated that after a 2-year demonstration project conducted in two states, DOD did not favor establishing a permanent benefit because other types of care had higher priority for the Defense Health Program's (DHP) limited funds.
1994	The National Defense Authorization Act for Fiscal Year 1995 directed DOD to (1) establish another demonstration program at no fewer than 10 Military Treatment Facilities for 3 years to evaluate the feasibility and advisability of expanding DOD's health system to include chiropractic care and (2) convene the Oversight Advisory Committee to prepare and submit to Congress a plan for evaluating the program.
1997	The National Defense Authorization Act for Fiscal Year 1998 directed DOD to add 3 additional sites to the demonstration project.
2000	DOD issued its <i>Final Chiropractic Health Care Demonstration Program Report</i> in which it determined that the program was feasible but not fiscally practical.
2000	The Floyd D. Spence National Defense Authorization Act for Fiscal Year 2001 directed DOD to develop a plan to provide the chiropractic benefit for all active duty members of the military. The act also required GAO to monitor and evaluate the implementation of DOD's chiropractic care program.
2001	DOD issued its implementation plan, which served as an operational framework for implementing its chiropractic benefit.
2005	In its September 2005 report, ² GAO concluded that DOD's chiropractic program had been implemented at 42 military treatment facilities but that DOD had not completed all of the actions described in its implementation plan.
2011	Letters exchanged between members of the House Armed Services Committee and the Assistant Secretary of Defense for Health Affairs requested that DOD review DOD chiropractor classifications using the Department of Veterans Affairs (VA) classification as a guide.
2012	Congress directed GAO to review the wage rates of DOD chiropractors and report no later than April 1, 2013. ³

Source: GAO analysis of DOD information.

²GAO, *Defense Health Care: DOD Has Established a Chiropractic Benefit for Active Duty Personnel*, GAO-05-890R (Washington, D.C.: Sept. 6, 2005).

³See page 178 of H.R. Rep. No. 112-479, the conference report accompanying the National Defense Authorization Act for Fiscal Year 2013.

Objectives

1. Identify the number and location of DOD's chiropractors who provide care for active duty servicemembers.
2. Compare the wage rates of DOD's federal civilian chiropractors with the wage rates of other DOD federal civilian health care professionals with similar requirements and health care responsibilities.

Objective 1: Identify the number and location of DOD's chiropractors who provide care for active duty servicemembers.

DOD employs 90 chiropractors at 62 military treatment facilities. The distribution of DOD's chiropractic care program across the services, as of January 2013, is detailed below:

Table 2: Distribution of Chiropractors Working for DOD

Service	DOD's federal civilian chiropractors	Contracted chiropractors	Total chiropractors	Military treatment facilities
Army	41	0	41	25
Navy	4	20	24	16
Air Force	0	22	22	20
Other ^a	1	2	3	1
Total	46	44	90 ^b	62

Source: GAO analysis of DOD data.

^aThe Joint Task Force National Capital Region Medical Command employs two chiropractors, and another is employed by TRICARE Management Activity.

^bThree chiropractors work part-time, two from the Army and one from the Navy. In addition, according to officials, the Army is in the process of hiring one additional federal civilian chiropractor and both the Army and the Air Force are in the process of contracting additional chiropractors.

Objective 2: Compare the wage rates of DOD's federal civilian chiropractors with the wage rates of other DOD civilian health care professionals with similar requirements and health care responsibilities.

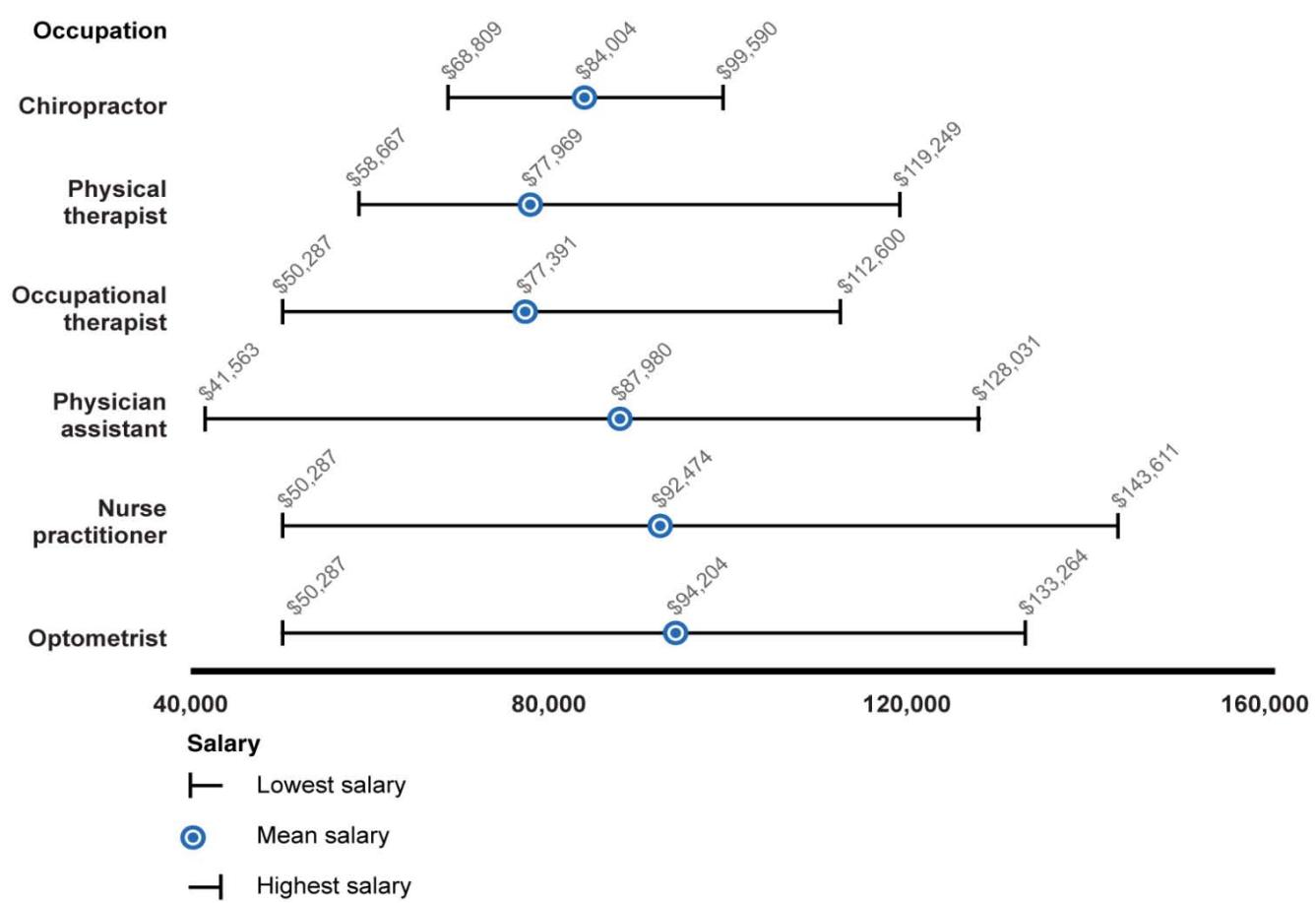
- The mean salary of DOD's federal civilian chiropractors is similar to the mean salary of comparable DOD federal civilian health care occupations.
- All 46 DOD federal civilian chiropractors are employed at the Office of Personnel Management (OPM) General Schedule (GS) 12 level. The GS is the pay plan for most DOD federal civilians. The pay range for a GS 12 position is \$60,274 to \$78,355, which reflects basic pay only, as of fiscal year 2012.
- As of January 2013, the pay range for a DOD federal civilian chiropractor is \$68,809 to \$99,590, which includes both basic pay and locality pay.
- The mean DOD federal civilian chiropractor salary is \$84,004, which includes both basic pay and locality pay. This does not include the value of in-kind and deferred benefits, such as those for health care insurance or retirement.⁴

⁴GAO has previously reported —see GAO, *Military Personnel: Military and Civilian Pay Comparisons Present Challenges and Are One of Many Tools in Assessing Compensation*, GAO-10-561R (Washington, D.C. : Apr.1, 2010)—that when comparing compensation, it is important to assess total compensation. That includes a position's cash compensation or wages in addition to in-kind and deferred benefits. However, for this briefing we did not capture benefits because DOD federal civilians receive the same benefits package.

Objective 2: Compare the wage rates of DOD's federal civilian chiropractors with the wage rates of other DOD federal civilian health care professionals with similar requirements and health care responsibilities.

The DOD federal civilian chiropractor mean salary⁵ is similar to the mean salary of comparable DOD federal civilian health care occupations. Our comparison of mean salaries for the selected positions shows they are within 12 percent of the chiropractor salary. While these positions have similar education and training, they have some different responsibilities.

Figure 1: Annual Salary Range for Selected Civilian Medical Positions at DOD



Source: GAO analysis of DOD data.

⁵ DOD federal civilian salary information is as of January 31, 2013, and reflects both basic and locality pay.

Objective 2: Compare the wage rates of DOD's federal civilian chiropractors with the wage rates of other DOD federal civilian health care professionals with similar requirements and health care responsibilities.

Table 3: Description of Selected DOD Health Care Positions^a

Occupation	Education/Training	Licensure	Certification
Chiropractor	Doctor of Chiropractic degree: 7 years of total education = 3 years of undergraduate education + 4-year degree from a program accredited by the Council on Chiropractic Education; National Board of Chiropractic Examiners Part IV Examination	A current, active, valid, and unrestricted license in chiropractic practice in a U.S. state or in the District of Columbia	Optional; None required
Physical Therapist	Masters or doctoral degree in physical therapy: 6 to 8 years total education from a program accredited by the American Physical Therapy Association Commission on Accreditation in Physical Therapy Education; National Physical Therapy Examination	A current, full, and unrestricted license in physical therapy practice in a U.S. state or in the District of Columbia	Optional; Additional certifications may be required to perform advanced clinical privileges
Occupational Therapist	Masters or doctoral degree in occupational therapy from a program accredited by the Accreditation Council for Occupational Therapy Education, including completion of a clinical internship of at least 6-months' duration	A current, unrestricted license to practice occupational therapy in a U.S. state or in the District of Columbia	Optional; however, current certification from the National Board for Certification in Occupational Therapy is required for the Army
Physician Assistant	Masters degree from a Physician Assistant Training Program accredited by the Accreditation Review Commission on Education for the Physician Assistant	A current, unrestricted license in a U.S. State or in the District of Columbia	Yes, current certification by passing the Physician Assistant National Certifying Examination before clinical privileges are granted
Optometrist	Doctor of Optometry degree: 8 years of total education = 4-year undergraduate degree + 4-year degree from a program accredited by the Council on Optometric Education.	A current, unrestricted license as an optometrist in a U.S. state or in the District of Columbia	Optional; None required

Source: GAO analysis of DOD information.

^a These positions were selected for comparison with the chiropractors because they have similar post and undergraduate education requirements, licensure and certification requirements, and types of responsibilities.

Objective 2: Compare the wage rates of DOD's federal civilian chiropractors with the wage rates of other DOD federal civilian health care professionals with similar requirements and health care responsibilities.

- In addition to identifying the wage ranges and mean salaries of select DOD federal civilian health care positions, we also identified the grade levels of these positions on the OPM General Schedule.
- According to officials, DOD used chiropractor position descriptions and OPM's guidance to classify and grade its federal civilian chiropractors at the appropriate GS grade level.

Objective 2: Compare the wage rates of DOD's federal civilian chiropractors with the wage rates of other DOD federal civilian health care professionals with similar requirements and health care responsibilities.

- As of January 2013, all DOD federal civilian chiropractors were GS grade level 12. Most federal civilians in the other selected health care positions we reviewed were in the GS 11 and 12 grade levels; however, some were at the GS 9, GS 13, and GS 14 grade levels.
- According to DOD officials, DOD civilian chiropractors are currently not above the GS 12 grade level because they represent a small population, and DOD has not identified a need for chiropractors at the GS 13 grade level based on job responsibilities, such as supervision.
 - For example, DOD has almost 6 times more civilian physical therapists and over 15 times more civilian physician assistants than civilian chiropractors.
- See table 4 on page 13 for the distribution of GS grade levels for the selected health care positions.

Objective 2: Compare the wage rates of DOD's federal civilian chiropractors with the wage rates of other DOD federal civilian health care professionals with similar requirements and health care responsibilities.

Table 4: General Schedule (GS) Distribution of Selected DOD Civilian Health Care Professionals

Occupation	GS 09	GS 11	GS 12	GS 13	GS 14	Total
Chiropractor			46			46
Physical Therapist	7	160	95	7	1	270
Occupational Therapist	3	69	68	8	1	149
Physician Assistant	4	115	559	35		713
Nurse Practitioner ^a	6	108	474	148	1	737
Optometrist		6	84	12	1	103

Source: GAO analysis of DOD data.

^aBecause they typically have more specialized training, this analysis does not include nurse midwives and nurse anesthetists in the nurse practitioner occupation.

Scope and Methodology

- To identify the number and location of DOD chiropractors that provide care for active duty servicemembers, we included in our scope all DOD chiropractors—those contracted and those working as DOD federal civilians—in the Army, the Navy, and the Air Force as of January 2013.
- For the comparison of wage rates and GS grade levels, we included in our scope DOD's federal civilian chiropractors and DOD federal civilian health care positions that we identified based on the criteria in the mandate. These data are from DOD's system of record for civilian personnel as of January 2013.

Scope and Methodology

To identify the number and location of DOD chiropractors, we

- interviewed DOD officials from the
 - Office of the Assistant Secretary of Defense for Health Affairs, TRICARE Management Activity
 - Military Health System Chief Human Capital Office
 - Army Office of the Surgeon General/Medical Command
 - Naval Medical Logistics Command
 - Navy Bureau of Medicine
 - Air Force Commodity Council
- requested and analyzed information about the number, location, and employer of chiropractors working for DOD.

Scope and Methodology

To identify health care positions within DOD that have somewhat comparable training, skill sets, licensure requirements, certification requirements, and health care responsibilities, we

- obtained and reviewed military service position descriptions for chiropractors and other health care professionals and compared the positions using the criteria identified in the mandate
- interviewed DOD officials from the Office of the Assistant Secretary of Defense for Health Affairs, the Military Health System Chief Human Capital Office
- reviewed relevant reports and congressional correspondence from DOD.

Scope and Methodology

To determine wage rates for DOD federal civilian chiropractors and other identified DOD federal civilian health care professionals, we

- requested, analyzed, and assessed the reliability of salary and GS grade level data from the Defense Civilian Personnel Data System, the system of record for DOD's civilian personnel data. We found these data reliable for the purposes of our work.
- compared the wage range and mean wage of DOD federal civilian chiropractors with DOD federal civilian health care professions that we determined to be comparable.

Scope and Methodology

- We provided DOD with the opportunity to review these slides, and its comments were incorporated as appropriate.
- We conducted this performance audit from August 2012 through March 2013 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings based on our audit objectives.

GAO Contact and Staff Acknowledgments

- For more information on this subject, please contact Brenda S. Farrell at (202) 512-3604 or farrellb@gao.gov
- In addition to the contact named above, Lori Atkinson (Assistant Director), Edward Anderson, Jr., Timothy Carr, Grace Coleman, Sara Cradic, Cynthia Grant, Kelly Rubin, Amie Steele, and Michael Willems made key contributions to this briefing.

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